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*Attorneys for Defendants Rama Akash, Adam Burnside, Jo Gentry, John King, Timothy Knatz, Joseph Kobrick, and Gillian Lambey*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CURTIS L. DOWNING,

Case No. 2:16-cv-02632-RFB-PAL

Plaintiff,

V.

JO GENTRY, *et al.*,

**DEFENDANTS' MOTION TO  
EXTEND STAY FOR SETTLEMENT  
PURPOSES**

## Defendants.

Defendants Rama Akash, Adam Burnside, Jo Gentry, John King, Timothy Knatz, Joseph Kobrick, and Gillian Lambey, by and through counsel, Adam Paul Laxalt, Nevada Attorney General, and Jared M. Frost, Senior Deputy Attorney General, hereby move this Court to extend the stay for an additional thirty (30) days for the purposes of settlement discussions.

On October 25, 2017, the Court imposed a ninety (90) day stay for the purposes of settlement discussions and referred the case to the Inmate Early Mediation Program. See ECF No. 6. The stay is currently set to expire on January 23, 2017. Pursuant to Rule 6(b)(1)(A), this Court may extend the stay for good cause.

1 Defendants submit that there is good cause to extend the stay for an additional thirty  
2 (30) days. On January 5, 2017, the parties participated in a mediation conference. ECF  
3 No. 10. The parties did not reach a resolution at the conference but agreed to continue  
4 informal negotiations in an effort to reach an agreement. *Id.* Defendants therefore request  
5 that the stay in this matter be extended for an additional thirty (30) days to allow the  
6 parties to conclude their negotiations and so that Plaintiff is not prematurely charged the  
7 filing fee in this case. Defendants further request that they be permitted to file the stay  
8 report form at the conclusion of the extended stay period.

9 DATED this 9th day of January, 2017.

10 ADAM PAUL LAXALT  
11 Attorney General

12 By: /s/ Jared M. Frost  
13 JARED M. FROST (Bar No. 11132)  
Senior Deputy Attorney General

14 *Attorneys for Defendants*

15  
16 IT IS SO ORDERED. The stay in this case is extended for an additional thirty (30)  
17 days. Defendants shall file their report on or before February 22, 2018.  
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19 DATED January 17, 2018.  
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23 UNITED STATES MAGISTRATE JUDGE  
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## **CERTIFICATE OF SERVICE**

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on January 9, 2018, I electronically filed the foregoing **DEFENDANTS' MOTION TO EXTEND STAY FOR SETTLEMENT PURPOSES** via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, addressed to the following:

Curtis Downing, #18675  
Southern Desert Correctional Center  
P.O. Box 208  
Indian Springs, Nevada 89070  
*Plaintiff, Pro Se*

/s/ Carol A. Knight  
CAROL A. KNIGHT, an employee of the  
Office of the Nevada Attorney General